

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)
)
Plaintiff)
v.) Case No.PJM 08 cv 0921
)
WORLD AVENUE USA, LLC, et al.)
Defendants)

)

**DEFENDANT/THIRD PARTY PLAINTIFF, WORLD AVENUE USA, LLC'S
UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Defendant/Third Party Plaintiff, WORLD AVENUE USA, LLC ("WAUSA") hereby moves for an extension of time until and including Friday, July 9, 2010, in which to file its Response to Third Party Defendants Hypertouch and James Joseph Wagner's Motion to Dismiss Third Party Complaint [DE 263], and, until and including Friday, July 30, 2010, in which to file its Reply in Support of it Motion for Partial Summary Judgment [DE 266-167], and as for good cause, states:

1. Third Party Defendants Hypertouch and James Joseph Wagner filed their Motion to Dismiss Third Party Complaint at DE 263.
2. Third Party Plaintiff WAUSA's Response is due on July 2, 2010.
3. Defendant WAUSA filed its Motion for Partial Summary Judgment on June 11, 2010 [DE 266-267].
4. On July 1, 2010, Plaintiff Beyond Systems, Inc. (BSI) has filed its Consent Motion for Extension of Time to Respond to WAUSA's Motion for Partial Summary Judgment [DE 311] pursuant to agreement of counsel, extending BSI's response date to July 9, 2010, and accordingly extending WAUSA's time to reply by equivalent number of days.

5. Defendant/Third Party Plaintiff, WAUSA requires additional time within which to address the arguments raised within the filed Opposition and Motion, and believes that a short extension is necessary.

6. Pursuant to Local Rule 104, counsel for WAUSA have contacted counsel for BSI, Hypertouch and James Joseph Wagner in an effort to determine whether the extension is opposed by BSI, Hypertouch and James Joseph Wagner, and counsel for BSI, Hypertouch and James Joseph Wagner have consented to the extension.

WHEREFORE, Defendant/Third Party Plaintiff, WORLD AVENUE USA, LLC respectfully requests entry of an Order extending the time within which to file its Response to Third Party Defendants Hypertouch and James Joseph Wagner's Motion to Dismiss Third Party Complaint [DE 263] until and including Friday, July 9, 2010, and Reply in Support of its Partial Motion for Summary Judgment [DE 266-267] until and including Friday, July 30, 2010, and for such other and further relief as this Court deems just and appropriate.

Dated: July 2, 2010.

Respectfully submitted,

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--and--

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